

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
Paula Kritzman, Individually and on behalf
of all others similarly situated,

Plaintiff,

v.

AMERICAN EXPRESS RETIREMENT
PLAN, AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS COMPANY
EMPLOYEE BENEFITS ADMINISTRATION :
COMMITTEE, JOHN DOES 1-100 :

Defendants.
-----X

Civil Action No. 06-00233 (LAK)

**NOTICE OF MOTION TO ADMIT
COUNSEL MARK K. GYANDOH
PRO HAC VICE**

To: All Counsel

PLEASE TAKE NOTICE that upon the annexed affirmations of Curtis V. Trinko and Mark K. Gyandoh in support of this motion and the Certificate of Good Standing annexed thereto, we will move this Court before the Honorable Lewis A. Kaplan at the United State Courthouse of the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of movant, an associate of the law firm of Schiffrin & Barroway, LLP and a member in good standing of the Bar of the State of Pennsylvania, as attorney pro hac vice to argue or try this case in whole or in part as counsel.

Dated: May 1, 2006

Respectfully submitted,

LAW OFFICES OF CURTIS V. TRINKO, LLP

By: 

Curtis V. Trinko (CT-1838)

16 West 46th Street, 7th Floor

New York, new York 10036

Tel: (212) 490-9550

Fax: (212) 986-0158


Email: ctrinko@trinko.com

CERTIFICATE OF SERVICE

I, Curtis V. Trinko, hereby certify that true and correct copies of the Notice of Motion for Admission Pro Hac Vice of Mark K. Gyandoh in the above-captioned matter; Affirmation of Curtis V. Trinko in support of the Motion for the Admission Pro Hac Vice of Mark K. Gyandoh ; Affirmation of Mark K. Gyandoh in Support of the Motion to Admit Counsel Pro Hac Vice; [Proposed] Order Granting Motion for Admission Pro Hac Vice of Mark K. Gyandoh; Notice of Motion for Admission Pro Hac Vice of Edward W. Ciolko in the above-captioned matter; Affirmation of Curtis V. Trinko in Support of the Motion for the Admission Pro Hac Vice of Edward W. Ciolko; Affirmation of Edward W. Ciolko in Support of the Motion to Admit Counsel Pro Hac Vice; [Proposed] Order Granting Motion for Admission Pro Hac Vice of Edward W. Ciolko; Notice of Motion for Admission Pro Hac Vice of Joseph H. Meltzer in the above-captioned matter; Affirmation of Curtis V. Trinko in Support of the Motion for the Admission Pro Hac Vice of Joseph H. Meltzer; Affirmation of Joseph H. Meltzer in Support of the Motion to Admit Counsel Pro Hac Vice; [Proposed] Order Granting Motion for Admission Pro Hac Vice of Joseph H. Meltzer were served on the following attorneys by means of postage prepaid, first class mail delivery through the U.S. Mails on this date:

PLEASE SEE ATTACHED SERVICE LIST

Dated: May 1, 2006
New York, New York



Curtis V. Trinko

SERVICE LIST IN KRITZMAN VS.
AMERICAN EXPRESS RETIREMENT PLAN ET AL.

Jeremy P. Blumenfeld, Esq.
Morgan, Lewis & Bockius, LLP
1701 Market Street
Philadelphia, Pennsylvania 19103
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Fax: (215) 963-5001

Christopher A. Parlo, Esq.
Morgan, Lewis & Bockius, LLP
101 Park Avenue
New York, New York 10178
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Fax: (212) 309-6273

ATTORNEYS FOR DEFENDANTS

Joseph H. Meltzer, Esq.
Edward W. Ciolko, Esq.
Mark K. Gyandoh, Esq.
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ATTORNEYS FOR PLAINTIFFS

Civil Action No. 06-CV-00233 (LAK)

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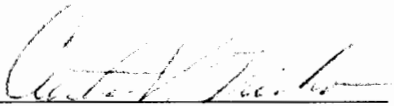
CURTIS V. TRINKO

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SOUTHERN DISTRICT OF NEW YORK**

Paula Kritzman, Individually and on behalf
of all others similarly situated,

Plaintiff,

V.

AMERICAN EXPRESS RETIREMENT
PLAN, AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS COMPANY EMPLOYEE
BENEFITS ADMINISTRATION COMMITTEE,
JOHN DOES 1-100,

Defendants.

Civil Action No. 06-CV-0233

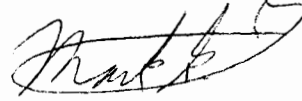
**AFFIDAVIT OF MARK K. GYANDOH IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE**

MARK K. GYANDOH, being duly sworn, herby deposes and says as follows:

1. I am an associate with the law firm of Schifffrin & Barroway, LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned proceedings.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the State of Pennsylvania as well as the State of New Jersey.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore, your affiant respectfully submits that he be permitted to appear as Counsel and advocate *pro hac vice* in these proceedings.

Dated: April 12, 2006

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark G. Gyandoh", written over a horizontal line.

Mark G. Gyandoh



Supreme Court of Pennsylvania

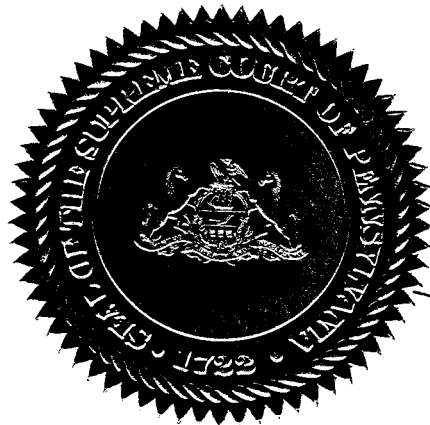
CERTIFICATE OF GOOD STANDING

Mark K. Gyandoh, Esq.

DATE OF ADMISSION

March 15, 2002

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: April 19, 2006**

A handwritten signature in black ink, appearing to read "Irene M. Bizzoso".

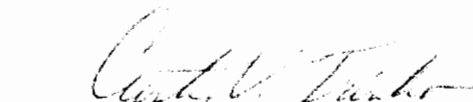
Irene M. Bizzoso
Deputy Prothonotary

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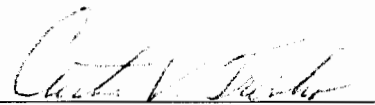
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SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff,	:
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v.	:
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AMERICAN EXPRESS RETIREMENT	:
PLAN, AMERICAN EXPRESS COMPANY,	:
AMERICAN EXPRESS COMPANY	:
EMPLOYEE BENEFITS ADMINISTRATION :	:
COMMITTEE, JOHN DOES 1-100	:
	:
Defendants.	:
-----X	

Civil Action No. 06-CV-00233 (LAK)

(PROPOSED) ORDER
ADMITTING COUNSEL *PRO HAC VICE*

The motion for admission to practice pro hac vice in the above-captioned matter is granted pursuant to this Court's authority set forth in the Court's Individual Practices and under Local Rule 1.3(c) of the Local Rules of the Southern and Eastern District of New York. The admitted attorney, Mark K. Gyandoh, is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice pro hac vice is required to pay a \$ 25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying my mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission pro hac vice for the above-listed case will be made on the roll of attorneys.

The attorney admitted pro hac vice must serve a copy of this Order on all other counsel in this case.

BY THE COURT:

LEWIS A. KAPLAN, U.S.D.J.